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VIA ECF

The Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Wultz v. Bank of China Ltd.*, 11-cv-01266 (SAS) (GWG)

Dear Judge Gorenstein:

We respectfully submit this letter on behalf of defendant Bank of China, Ltd. (“BOC”) to request the Court’s approval of the briefing schedule agreed to by the parties to address the issues raised in the *Wultz* plaintiffs’ December 12, 2014 letter (Dkt. No. 754). In that letter, plaintiffs seek to compel BOC to meet and confer regarding certain documents withheld under the attorney-client and work product privileges and to conduct additional searches for Shurafa counterparty documents.

The parties have conferred regarding an appropriate briefing schedule and have agreed on the following deadlines:

- BOC’s response letter will be due on Tuesday, December 23, 2014; and
- Plaintiffs’ reply letter will be due on Wednesday, January 7, 2015.

We respectfully request that the Court approve this briefing schedule.

Respectfully submitted,

/s/ Nathan T. Alexander

Nathan T. Alexander

cc: Counsel of Record